

FITCHBURG GAS AND ELECTRIC LIGHT COMPANY
D.T.E. 03-26

THIRD SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF
TELECOMMUNICATIONS AND ENERGY TO
FITCHBURG GAS AND ELECTRIC LIGHT COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Fitchburg Gas and Electric Light Company (“Fitchburg” or “Company”) the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary L. Cottrell, Secretary of the Department and on all parties; also submit one (1) copy of the responses to John J. Geary, Hearing Officer; and one (1) copy of the responses to Robert J. Harrold, Assistant Director, Electric Power Division.
8. In addition to filings, all non-proprietary responses should be submitted by e-mail to dte.efiling@state.ma.us and to the e-mail address of any party required to be served.
9. Responses are due on or before Monday, November 22, 2004.

INFORMATION REQUESTS

DTE 3-1 Please refer to the Company’s Annual Energy Efficiency Report for 2001, dated August 5, 2002 (“2001 Annual Report”).

(a) provide a copy of the billing history analysis used to verify savings described at 1 under Program Monitoring and Evaluation.

(b) explain whether the savings verification described at 1 under Program Monitoring and Evaluation included statistical analysis. If so, provide the results of such statistical analysis, including estimates of precision. If statistical analysis was not used, please explain.

(c) provide a copy of the evaluation performed by GDS Associates described at 6 under Program Monitoring and Evaluation.

(d) explain whether the evaluation performed by GDS Associates included statistical analysis. If so, provide the results of such statistical analysis, including estimates of precision. If statistical analysis was not used, please explain.

(e) explain whether the verification of engineering estimates described at 7 under Program Monitoring and Evaluation included statistical analysis. If so, provide the results of such statistical analysis, including estimates of precision. If statistical analysis was not used, please explain.

(f) explain whether the verification of engineering estimates described at 8 under Program Monitoring and Evaluation included statistical analysis. If so, provide the results of such statistical analysis. If statistical analysis was not used, please explain.

DTE 3-2 Refer to the Fitchburg's Annual Energy Efficiency Report for 2002, dated August 1, 2003 ("2002 Annual Report").

(a) provide a copy of the billing history analysis described at 1 under Program Monitoring and Evaluation.

(b) explain whether the savings verification described at 1 under Program Monitoring and Evaluation included statistical analysis. If so, provide the results of such statistical analysis, including estimates of precision. If statistical analysis was not used, please explain.

(c) explain whether the verification of engineering estimates described at 7 under Program Monitoring and Evaluation included statistical analysis. If so, provide the results of such statistical analysis, including estimates of precision. If statistical analysis was not used, please explain.

(d) explain whether the verification of engineering estimates described at 8 under Program Monitoring and Evaluation included statistical analysis. If so, provide the results of such statistical analysis. If statistical analysis was not used, please explain.